

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

DECLARATION OF JON PASCHAL

I, Jon Paschal, hereby declare as follows:

1. I am an adult over twenty-one years of age and am competent to testify to all matters contained herein. I am the Director of Medical Monitoring and Consulting at Garretson Resolution Group ("GRG"), a position I have held since October 8, 2012. I have personal knowledge of the facts set forth herein and if called and sworn as a witness, I could and would testify competently thereto.

2. In connection with the class action settlement (“Settlement”) in this case, the Court appointed GRG to serve as the Administrator of the Settlement’s Baseline Assessment Program (“BAP”). As the Director of Medical Monitoring and Consulting at GRG, I am tasked with implementing the BAP. Additionally, I am responsible for managing communications with Settlement Class Members, including Retired NFL Football Players.¹

3. I personally have had a telephone conversation with Retired NFL Football Player and Settlement Class Member, Fred Willis, when he called for information concerning the BAP.

4. Another individual on our staff, Chuck Spencer, the Provider Network Manager, also had a telephone conversation with Mr. Willis. Mr. Spencer has briefed me on that conversation.

5. When he called and I spoke with him, Mr. Willis identified himself as a player advocate. In response to his question, I told Mr. Willis that the commencement date of the BAP had been set by the Settlement Agreement and would be June 6, 2017. He also asked if I could give him information on when specific doctors would be approved for participation in the BAP. I told him that I was unable to provide him with that information.

6. Neither I nor Mr. Spencer provided Mr. Willis with information other than that which is publicly available on the Settlement website (www.nflconcussionsettlement.com).

7. Neither I nor Mr. Spencer provided Mr. Willis with the identities of any of the persons who will serve as, or who were being considered at the time to serve as, Qualified BAP Providers or Qualified MAF Physicians.

THE DECLARANT SAYS NOTHING FURTHER.

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Settlement Agreement.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of March, 2017.


Jon Paschal